

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SANDRA BIEDRON,

Plaintiff,

v.

THE UNIVERSITY OF CHICAGO, as operator
of ARGONNE NATIONAL LABORATORY,

Defendant.

No.

Jury Demand

03C 4427
DOCKETED
JUN 26 2003

MAGISTRATE JUDGE KEYS

COMPLAINT

NOW COMES Plaintiff, SANDRA BIEDRON, by and through her attorneys
ABRAHAMSON VORACHEK & MIKVA, and complains of Defendant, THE UNIVERSITY OF
CHICAGO, as operator of ARGONNE NATIONAL LABORATORY, as follows:

INTRODUCTION

1. Count I of this action alleges sex discrimination and is brought pursuant to Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, §2000e, *et seq.* ("Title VII"). Count II alleges retaliation and is also brought pursuant to Title VII. Count III alleges violation of the Equal Pay Act of 1963, 29 U.S.C. §206, *et seq.* ("EPA"). Count IV alleges a wilful violation of the Equal Pay Act.

PARTIES AND JURISDICTION

2. Plaintiff Sandra Biedron, a woman, is a resident of Palos Park, Illinois.

3. Defendant The University of Chicago is a corporation organized under the laws of the State of Illinois, with its principal place of business in Illinois. It is an employer within the meaning of 42 U.S.C. §2000e, *et seq.* and 29 U.S.C. §206, *et seq.* Defendant operates Argonne National Laboratory (“Argonne”), located in Argonne, Illinois, under Contract No. W-31-109-ENG-38 with the United States Department of Energy.

4. This Court has jurisdiction over Counts I and II under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e-5(f), as amended by the Civil Rights Act of 1991 (42 U.S.C. 1981A), and pursuant to 28 U.S.C. §§ 1331 and 1343. This Court has jurisdiction over Counts III and IV under the Equal Pay Act, 29 U.S.C. §206(d), and pursuant to 28 U.S.C. §§ 1331 and 1343.

5. Venue is proper in the Northern District of Illinois because the incidents complained of herein occurred in this District, and because both Plaintiff and Defendant reside within this District.

6. All conditions precedent to jurisdiction have occurred. Plaintiff filed charges of discrimination alleging violation of Title VII with the Equal Employment Opportunity Commission on September 30, 2002. The Notices of Right to Sue were received on March 28, 2003. Copies of the Charges of Discrimination and the Notices of Right to Sue are attached hereto as Exhibits A and B, respectively.

BACKGROUND

7. Plaintiff has been employed by Defendant at the Argonne facility since November 1993, except for a brief period between June and September 1995. She is a scientist and currently

works in the Experimental Facilities Division (XFC) of the Advanced Photon Source (APS) organization at Argonne. She received a Ph.D. in Accelerator Physics in December, 2001.

8. In January 2002, an independent report by the Committee on the Status of Women in Physics of the American Physical Society ("the Committee") outlined the many inequities and discrimination to which female scientists employed by Defendant at Argonne have been subjected. For example, the report noted that only 5.7 percent of the scientists at pay grades 705-710 were female (in the eight divisions examined by the investigative team, including the division in which Plaintiff was employed).

9. Plaintiff has consistently performed her job at Argonne satisfactorily, and she has consistently been commended for her work both within and outside Argonne. For example, her area of expertise includes beam physics, and she was requested to present her work at the Accelerator Advisory Committee Review Meetings, an opportunity made available only to those engaged in the best science on beam physics. Plaintiff is an accomplished scientist, having authored numerous papers in professional refereed journals, presented papers at scientific conferences, and been invited to appear at various scientific seminars and meetings.

10. Despite her expertise and consistently strong performance, Plaintiff has continually been treated less favorably than males in terms of pay, job opportunities, and treatment. For example, although Plaintiff performed the same job as a Chief of Operations (CO) as did males, Defendant was only willing to employ her pursuant to a series of contracts (*i.e.*, limited term appointments). Her male counterparts received regular position appointments. Unlike her male peers, Plaintiff's title and compensation did not reflect her position as CO throughout the time she performed those responsibilities..

11. The compensation received by Plaintiff is also less than that of her male peers at Argonne. Moreover, Argonne applied different criteria to Plaintiff and delayed increases in her pay grade. For example, Plaintiff repeatedly requested a promotion to Grade 706. Her requests were denied. Plaintiff's prior supervisor, Antanas Rauchas, stated that a doctorate was required for a pay grade increase and promised Plaintiff that she would be "fast tracked" to Grade 706 as soon as she received her Ph.D., which she did in December 2001. Plaintiff still has not been promoted to Grade 706. Male employees at Argonne without a Ph.D. have been and are classified and paid at the Grade 706 level.

12. Plaintiff has not received the bonuses provided to her male counterparts at Argonne. For example, Plaintiff has performed significant work on the Low Energy Undulator Test Line ("LEUTL") project. The three males who worked on the LEUTL project received bonuses for their work, while Plaintiff did not.

13. During Plaintiff's tenure at Argonne, her supervisors made statements which demonstrated a discriminatory animus toward women. For example, when Plaintiff sought tuition reimbursement, she was asked why her husband could not pay for her schooling. Plaintiff's current supervisor asked when she and her husband were going to get down to the "serious business" of having a family.

14. Plaintiff has been treated differently than her male peers in the manner in which grant monies are distributed at Argonne. For example, although Plaintiff was identified as the primary investigator on one project, the funds for the project were distributed to the secondary investigator, a male. Moreover, unlike her male peers, Plaintiff's funds authority has been more limited.

15. In 2002, Argonne informed its employees of a restructuring. Plaintiff was told that she was being moved out of the Operations group. She was reassigned to the position of "Scientific

Communications Specialist,” a largely public relations function. Plaintiff’s job description for this position does not allow her to perform scientific work and, therefore, she has been precluded from advancing her career as a scientist. Plaintiff’s CO responsibilities were assigned to a male who has only a certificate from a local technical university, does not have the publication record of Plaintiff, and has less international recognition than Plaintiff. Males without the record of scientific accomplishment that Plaintiff has were allowed to remain in scientific positions.

16. Plaintiff was the only female CO in the Operations Group at the time of her transfer to the public relations specialist position and the only person moved out of the Operations Group into a non-scientific position.

17. From about May 2002 on, Plaintiff complained that she was being discriminated against because of her sex. She complained to Cindy Kuzma, a Human Resources representative.

18. On or about June 11, 2002, in a letter to Rauchas, Plaintiff complained about the discriminatory treatment to which she and other female scientists at Argonne were being subjected. Copies of that letter were provided to Efim Gluskin, her new supervisor; J. Murray Gibson, Laboratory Director; and Defendant’s Human Resources Department.

19. On or about June 13, 2002, Plaintiff sent a letter to Gluskin describing some of the less favorable treatment she had received in comparison to male scientists at Argonne.

20. In subsequent meetings with Gluskin and Defendant’s Human Resources representatives, Plaintiff complained of sex discrimination and the adverse effect on her ability to do her job and her career advancement.

21. Thereafter, the adverse actions and discriminatory conduct against Plaintiff escalated. For example, Plaintiff has again been denied a pay grade increase; denied funding for scientific projects; given lower ratings on performance evaluations than warranted, thereby affecting her salary

and bonuses; denied scientific positions and career opportunities given to males, often because Argonne did not post such positions or did not otherwise notify Plaintiff that such opportunities existed; and moved to a smaller office. As a result of Plaintiff's transfer to the public relations position, her opportunities to advance as a scientist have been effectively curtailed, and her ability to seek promotions to other scientific positions has been virtually eliminated. Plaintiff has never been notified of any corrective action taken by Argonne regarding her complaints of discrimination.

COUNT I
TITLE VII - SEX DISCRIMINATION

22. Plaintiff repeats and realleges Paragraphs 1 through 21 as though fully set forth herein.

23. By the conduct described above, Defendant, acting by and through its agents during the course of and within the scope of their employment, has intentionally discriminated against Plaintiff on the basis of her sex, in violation of Title VII.

24. As a result of the acts complained of herein, Plaintiff has suffered the loss of wages and benefits, promotional opportunities, humiliation, pain and suffering, future pecuniary losses, inconvenience, and loss of enjoyment of life.

WHEREFORE, Plaintiff prays for judgment in her favor and against Defendant as follows:

- a) that a finding be entered that Defendant intentionally discriminated against Plaintiff in violation of Title VII;
- b) that a finding be entered that Defendant acted with reckless indifference to and disregard for Plaintiff's federal protected rights under Title VII;
- c) that Plaintiff be awarded the wages, benefits and other compensation due to her as a result of Defendant's acts of discrimination;

- d) that Defendant be ordered to promote Plaintiff to Grade 706;
- e) that Plaintiff be awarded front pay;
- f) that Defendant be ordered to place Plaintiff in a Grade 706 position which will allow her to work as a scientist;
- g) that Plaintiff be awarded compensatory and punitive damages;
- h) that Plaintiff be awarded prejudgment interest;
- i) that Plaintiff be awarded her reasonable attorneys fees and costs; and
- j) that Plaintiff be awarded such other relief as this Court may deem just and proper.

COUNT II
TITLE VII - RETALIATION

25. Plaintiff repeats and realleges Paragraphs 1-24 as though fully set forth herein.

26. By engaging in the foregoing conduct, Defendant has and continues to retaliate against Plaintiff for engaging in the federally protected conduct of opposing and objecting to sex discrimination, in violation of Title VII.

27. By engaging in said retaliatory conduct, Defendant has acted wilfully and with malice and reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff prays for judgment in her favor and against Defendant as follows:

- a) that a finding be entered that Defendant acted with reckless indifference to and disregard for Plaintiff's federal protected rights under Title VII;
- b) that a finding be entered that Defendant intentionally discriminated against Plaintiff in violation of Title VII;

- c) that Plaintiff be awarded the wages, benefits and other compensation due to her as a result of Defendant's acts of discrimination;
- d) that Defendant be ordered to promote Plaintiff to Grade 706.
- e) that Plaintiff be awarded front pay;
- f) that Defendant be ordered to place Plaintiff in a position which will allow her to work as a scientist;
- g) that Plaintiff be awarded compensatory and punitive damages;
- h) that Plaintiff be awarded prejudgment interest;
- i) that Plaintiff be awarded her reasonable attorneys fees and costs; and
- j) that Plaintiff be awarded such other relief as this Court may deem just and proper.

COUNT III
EQUAL PAY ACT

28. Plaintiff repeats and realleges Paragraphs 1-24 as though fully set forth herein.

29. As alleged hereinabove, Defendant repeatedly paid Plaintiff less than the rate paid to male employees for equal work on jobs the performance of which required equal skill, effort, and responsibility, and which were performed under similar working conditions, in violation of the Equal Pay Act.

WHEREFORE, Plaintiff prays for judgment in her favor and against Defendant as follows:

- a) that a finding be entered that Defendant intentionally violated the Equal Pay Act by paying Plaintiff less than male employees;
- b) that Plaintiff be awarded the wages, benefits and other compensation owed to her as a result of Defendant's actions;

- c) that Plaintiff be awarded front pay;
- d) that Plaintiff be awarded prejudgment interest;
- e) that Plaintiff be awarded reasonable attorneys' fees and costs;
- f) that Plaintiff be awarded such other relief as it deems proper.

COUNT IV
EQUAL PAY ACT - WILFULNESS

30. Plaintiff repeats and realleges Paragraphs 1-24 and 28-29 as though fully set forth herein.

31. As alleged hereinabove, Defendant repeatedly paid Plaintiff less than the rate paid to male employees for equal work on jobs the performance of which required equal skill, effort, and responsibility, and which were performed under similar working conditions, in violation of the Equal Pay Act.

32. Defendant knew that its actions violated the Equal Pay Act and/or showed reckless disregard for whether its actions were prohibited under the Equal Pay Act.

WHEREFORE, Plaintiff prays for judgment in her favor and against Defendant as follows:

- a) that a finding be entered that Defendant intentionally violated the Equal Pay Act by paying Plaintiff less than male employees;
- b) that Plaintiff be awarded the wages, benefits and other compensation owed to her as a result of Defendant's actions;
- c) that Plaintiff be awarded liquidated damages;
- d) that Plaintiff be awarded front pay;
- e) that Plaintiff be awarded prejudgment interest;

- f) that Plaintiff be awarded reasonable attorneys fees and costs; and
- g) that Plaintiff be awarded such other relief as this Court deems just and proper.

Plaintiff demands trial by jury on all counts of the Complaint.

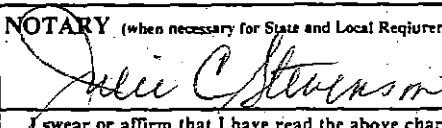
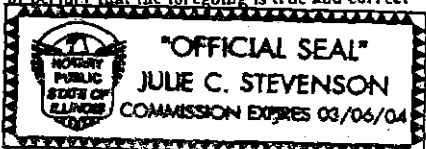
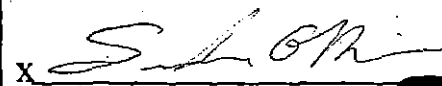
Respectfully submitted,

A handwritten signature in black ink, appearing to be 'D. Vorachek', is written over a horizontal line.

Darlene A. Vorachek
David A. Hemenway
ABRAHAMSON VORACHEK & MIKVA
120 North LaSalle Street, Suite 1050
Chicago, Illinois 60602
312/263-2698

Attorneys for Plaintiff

DATED: June 25, 2003

CHARGE OF DISCRIMINATION		AGENCY <input checked="" type="checkbox"/> IDHR <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER 210A205220
This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.			
Illinois Department of Human Rights and EEOC			
NAME (indicate Mr., Ms., Mrs.) Ms. Sandra Biedron		HOME TELEPHONE (include area code) 708/448-1990	
STREET ADDRESS 11357 McCarthy Road		CITY, STATE AND ZIP CODE Palos Park, IL 60464	DATE OF BIRTH 3 / 2 / 73
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)			
NAME Argonne National Laboratory		NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE (include area code) 630/252 -2000
STREET ADDRESS 9700 South Cass Avenue		CITY, STATE AND ZIP CODE Argonne, IL 60439	COUNTY DuPage
NAME University of Chicago		TELEPHONE (include area code) 773/702-8800	
STREET ADDRESS 5801 South Ellis Avenue		CITY, STATE AND ZIP CODE Chicago, IL 60637	COUNTY Cook
CAUSE OF DISCRIMINATION BASED ON: sex, retaliation		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) / / 9 30 / 02 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (if additional space is needed attach extra sheet(s))			
<div style="text-align: center; border: 2px solid black; padding: 5px; transform: rotate(-15deg); display: inline-block;"> RECEIVED EEOC SEP 30 2002 CHICAGO DISTRICT OFFICE </div> <ol style="list-style-type: none"> 1. I have worked at Argonne National Laboratory for nine years. I currently work in the Experimental Facilities Division (XFD) of the Advanced Photon Source (APS) organization. 2. I am one of only a few female scientists in the APS organization. For example, of the more than 400 individuals in APS, only about 35 are women at a 700 series grade level. 3. During my tenure at Argonne, I have suffered sex discrimination and retaliation for complaining about discrimination. An independent report by the Committee on the Status of Women in Physics (CSWP), issued in January 2002, outlines the inequities to which female scientists at Argonne have been subjected. That report was provided to Argonne. 			
<input checked="" type="checkbox"/> I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY (when necessary for State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief	
I declare under penalty of perjury that the foregoing is true and correct <div style="text-align: center;">  Notary Public Seal </div>		SIGNATURE OF COMPLAINANT  X SUBSCRIBED AND SWORN TO DATE 9-30-02	

Page 2 -

4. I was placed in positions that hurt my advancement and labeled me as filling a lesser position than my male peers. For example, when I served as Chief of Operations (CO), I was not only the sole female CO, but also the only one who was given a term appointment. None of the male COs had term appointments, but were given more established appointments. I was kept as a term appointment for quite some time.
5. The terms and conditions of my employment as a female scientist were different than those for my male counterparts. Examples are as follows: I was paid less than my male peers. Hurdles were placed in the way of my advancement, such as repeated requests for the same information, which delayed improvement in my job and/or compensation. Grade level increases were delayed or not received at all. Grant monies were not allocated equally between me and my male counterparts. My authority was questioned. I was denied funding and education requests. The response to my request for tuition reimbursement was, "Why can't your husband pay?"
6. By 2002, I still had not received a grade level increase, which is long overdue. In an April 2002 reorganization, I was moved into a dead end job; I was taken out of my science position and put in a public relations job which eliminated my ability to advance in science and technology.
7. I complained to Human Resources and others about the history of sex discrimination, the April 2002 reorganization and its negative impact on my career, and the unresolved compensation and grade level increases. Since my complaints, my new supervisor has refused to allow me to include any scientific responsibilities in my job description.

~~I declare under penalty of perjury that the foregoing is true and correct.~~

Sandra G. Breyer

Charging Party (Signature)

9-30-02

Date

Subscribed and sworn to before me this 30th day of September, 2002.

Julie C. Stevenson

Notary Public



Page 3 -8. I believe that I have been discriminated against on the basis of my sex, female, because:

- a) I am female.
- b) The terms and conditions of my employment are worse than those of male employees. I have been kept at a lower status and position, with fewer benefits and less compensation, than my male counterparts.
- c) I have been relegated to a position which will effectively end my career as a scientist, reducing further the number of women in hard science positions.

9. I believe that I have been retaliated against for complaining about sex discrimination because:

- a) I repeatedly complained to my employer about sex discrimination, but nothing was ever done.
- b) Since my complaints, I have been treated even more poorly by my employer.

I declare under penalty of perjury that the foregoing is true and correct.

John G. Brad

Charging Party (Signature)

9-30-02

Date

Subscribed and sworn to before me this 30th day of September, 2002.

Julie C. Stevenson
Notary Public



Page 2 -

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I declare under penalty of perjury that the foregoing is true and correct.

Sarah G. B. L.

Charging Party (Signature)

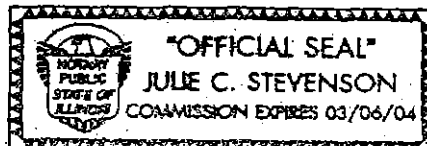
9-30-02

Date

Subscribed and sworn to before me this 30th day of September, 2002

Julie C. Stevenson

Notary Public



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 - c) I have been relegated to a position which will effectively end my career as a scientist, reducing further the number of women in hard science positions.
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 - b) Since my complaints, I have been treated even more poorly by my employer.

I declare under penalty of perjury that the foregoing is true and correct.

Spoke G. B. [Signature]

Charging Party (Signature)

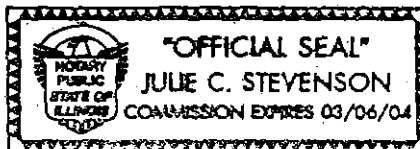
9-30-02

Date

Subscribed and sworn to before me this 30th day of September, 2002.

Julie C. Stevenson

Notary Public



EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE
 (Issued on request)

*Rec'd
3/26/03*

To: **Sandra Biedron**
11357 McCarthy Rd.
Palos Park, IL 60464

From:
Equal Employment Opportunity Commission
500 West Madison
Suite 2800
Chicago, Illinois 60661

Certified: 7001 0360 0000 0463 2211 CP Atty.



On behalf of a person aggrieved whose identity is **CONFIDENTIAL**
 (29 C.F.R. 1601.7(a))

Charge Number
 210A205220

EEOC Representative
 Nanisa Pereles

Telephone Number
 (312) 353-8739

(See the additional information attached to this form)

TO THE PERSON AGGRIEVED: This is your NOTICE OF RIGHT TO SUE. It is issued at your request. If you intend to sue the respondent(s) named in your charge, YOU MUST DO SO WITHIN NINETY (90) DAYS OF YOUR RECEIPT OF THIS NOTICE: OTHERWISE YOUR RIGHT TO SUE IS LOST.



More than 180 days have expired since the filing of this charge.



Less than 180 days have expired since the filing of this charge, but I have determined that the Commission will be unable to complete its process within 180 days from the filing of the charge.



With the issuance of this NOTICE OF RIGHT TO SUE, the Commission is terminating its process with respect to this charge.



It has been determined that the Commission will continue to investigate your charge.



ADEA: While Title VII and the ADA require EEOC to issue this notice of right to sue before you can bring a lawsuit, you may sue under the Age Discrimination in Employment Act (ADEA) any time 60 days after your charge was filed until 90 days after you received notice that EEOC has completed action on your charge.



Because EEOC is closing your case, your lawsuit under the ADEA must be brought within 90 days of your receipt of this notice. Otherwise, your right to sue is lost.



EEOC is continuing its investigation. You will be notified when we have completed action and, if appropriate, our notice will include notice of right to sue under the ADEA.



EPA: While Title VII and the ADA require EEOC to issue this Notice of Right to Sue before you can bring a lawsuit, you already have the right to sue under the Equal Pay Act (EPA) (You are not required to complain to any enforcement agency before bringing an EPA suit in court). EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

On Behalf of the Commission

3/26/03

(Date)

John P. Rowe
 John P. Rowe, District Director

Enclosures

Information Sheet
 Copy of Charge

cc: Respondent(s)

Argonne National Laboratory

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE
 (Issued on request)

*Rec'd
3/26/03*

To: Sandra Biedron

11357 McCarthy Rd.
 Palos Park, IL 60464

Certified: 7001 0360 0000 0463 2228 CP Atty.

☐ On behalf of a person aggrieved whose identity is **CONFIDENTIAL**
 (29 C.F.R. 1601.7(a))

From:

Equal Employment Opportunity Commission
 500 West Madison
 Suite 2800
 Chicago, Illinois 60661

Charge Number
 210A205221

EEOC Representative
 Nanisa Pereles

Telephone Number
 (312) 353-8739

(See the additional information attached to this form)

TO THE PERSON AGGRIEVED: This is your NOTICE OF RIGHT TO SUE. It is issued at your request. If you intend to sue the respondent(s) named in your charge, YOU MUST DO SO WITHIN NINETY (90) DAYS OF YOUR RECEIPT OF THIS NOTICE: OTHERWISE YOUR RIGHT TO SUE IS LOST.

- ☒ More than 180 days have expired since the filing of this charge.
- ☐ Less than 180 days have expired since the filing of this charge, but I have determined that the Commission will be unable to complete its process within 180 days from the filing of the charge.
- ☒ With the issuance of this NOTICE OF RIGHT TO SUE, the Commission is terminating its process with respect to this charge.
- ☐ It has been determined that the Commission will continue to investigate your charge.
- ☐ **ADEA:** While Title VII and the ADA require EEOC to issue this notice of right to sue before you can bring a lawsuit, you may sue under the Age Discrimination in Employment Act (ADEA) any time 60 days after your charge was filed until **90 days after you received notice that EEOC has completed action on your charge.**
- ☐ **Because EEOC is closing your case,** your lawsuit under the ADEA must be brought within 90 days of your receipt of this notice. Otherwise, your right to sue is lost.
- ☐ **EEOC is continuing its investigation.** You will be notified when we have completed action and, if appropriate, our notice will include notice of right to sue under the ADEA.
- ☐ **EPA:** While Title VII and the ADA require EEOC to issue this Notice of Right to Sue before you can bring a lawsuit, you already have the right to sue under the Equal Pay Act (EPA) (You are not required to complain to any enforcement agency before bringing an EPA suit in court). EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

On Behalf of the Commission

3/26/03
 (Date)

John P. Rowe
 John P. Rowe, District Director

Enclosures

Information Sheet
 Copy of Charge

cc: Respondent(s)

University of Chicago

JS 44
(Rev. 12/96)**CIVIL COVER SHEET**

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

SANDRA BIEDRON

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF COOK
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

THE UNIVERSITY OF CHICAGO, as operator of
ARGONNE NATIONAL LABORATORY

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT COOK
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Abrahamson Vorachek & Mikva
120 North LaSalle Street, Suite 1050
Chicago, IL 60602
(312) 263-2698

ATTORNEYS (IF KNOWN)

Winston & Strawn
35 West Wacker Drive
Chicago, IL 60601
(312) 558-5600

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- PTF DEF
Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business in This State ☐ 4 ☐ 4
Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business in Another State ☐ 5 ☐ 5
Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

42 U.S.C. §2000e and 29 U.S.C. §206(d), claims for sex discrimination, retaliation, and violation of Equal Pay Act.

VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23

DEMAND \$

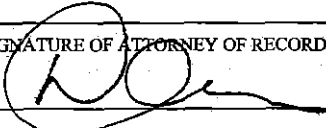
CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ YES ☐ NO**VIII. This case**☒ is not a refiling of a previously dismissed action.☐ is a refiling of case number _____, previously dismissed by Judge _____

DATE

6/25/03

SIGNATURE OF ATTORNEY OF RECORD



UNITED STATES DISTRICT COURT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

SANDRA BIEDRON, Plaintiff,

v.

THE UNIVERSITY OF CHICAGO, as operator of
ARGONNE NATIONAL LABORATORY, Defendant.

FILED-ED4

JUN 25 11 52 AM '03

Case Number: 03C 4427
U.S. DISTRICT COURT

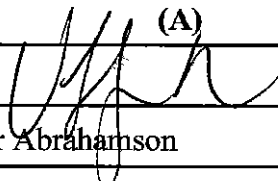
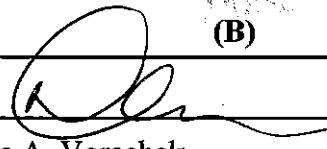
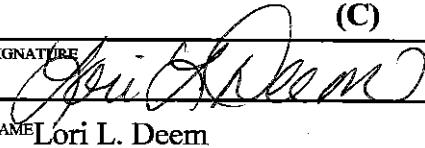
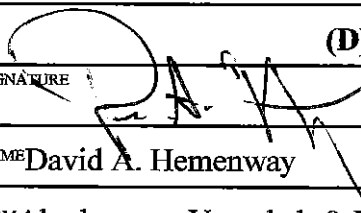
APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

DOCKETED

PLAINTIFF SANDRA BIEDRON

JUN 26 2003

03C 4427

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Vicki Lafer Abrahamson		NAME Darlene A. Vorachek	
FIRM Abrahamson Vorachek & Mikva		FIRM Abrahamson Vorachek & Mikva	
STREET ADDRESS 120 North LaSalle Street, Suite 1050		STREET ADDRESS 120 North LaSalle Street, Suite 1050	
CITY/STATE/ZIP Chicago, IL 60602		CITY/STATE/ZIP Chicago, IL 60602	
TELEPHONE NUMBER 312/263-2698		TELEPHONE NUMBER 312/263-2698	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 03126211		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06188818	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
(C)		(D)	
SIGNATURE 		SIGNATURE 	
NAME Lori L. Deem		NAME David A. Hemenway	
FIRM Abrahamson Vorachek & Mikva		FIRM Abrahamson Vorachek & Mikva	
STREET ADDRESS 120 North LaSalle Street, Suite 1050		STREET ADDRESS 120 North LaSalle Street, Suite 1050	
CITY/STATE/ZIP Chicago, IL 60602		CITY/STATE/ZIP Chicago, IL 60602	
TELEPHONE NUMBER 312/263-2698		TELEPHONE NUMBER 312/263-2698	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06255822		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06216227	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

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